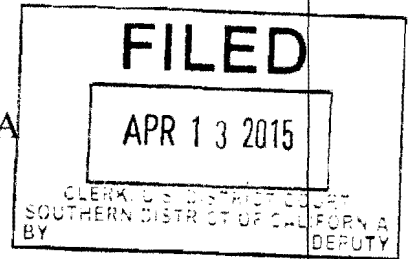


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA



UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT JOHNSON (1), and

ASHLEY JOHNSON (2)

Defendants.

Case No.:

COMPLAINT FOR VIOLATION OF

Title 18, U.S.C. §1591(a) - Sex  
Trafficking of a Minor

'15 MJ 1134

The undersigned Complainant, being duly sworn, states:

On or about April 11, 2015, within the Southern District of California, and in and affecting interstate and foreign commerce, defendants ROBERT JOHNSON and ASHLEY JOHNSON, did knowingly recruit, entice, harbor, transport, provide, obtain and maintain a person, to wit: a minor female (age 15), knowing, and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, or any combination of such means would be used to cause the person to engage in a commercial sex act, and that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act; in violation of Title 18, United States Code, Section 1591(a)(1).

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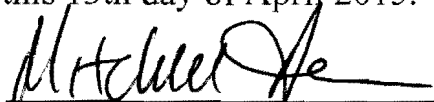
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1 And the complainant states that this complaint is based on the attached  
2 Statement of Facts incorporated herein by reference.

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CHRIS HAUGHEY  
Special Deputy U.S. Marshal

5  
6 Sworn to me and subscribed in my presence this 13th day of April 2015.

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8 MITCHELL D. DEMBIN  
U.S. MAGISTRATE JUDGE

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**STATEMENT OF FACTS**

I am a Detective with the San Diego Police Department. I have been employed with the San Diego Police Department for over seven years. I am currently assigned to the Violent Human Trafficking and Child Exploitation Task Force and the Innocence Lost Task Force and have been so assigned for over one year. My primary duties are to investigate cases involving human trafficking. I have been involved in over 100 human trafficking- and pimping-related investigations including both successful state and federal prosecutions. I am sworn as a Special Deputy US Marshal.

At approximately 7:30 a.m. on April 11, 2015, a 15-year-old minor female, hereinafter referred to as "MF" was detained by a National City Police Officer at approximately 500 National City Boulevard, in the Southern District of California. Based on the officer's training and experience, he believed that MF, youthful in appearance and loitering in an area known for prostitution, was involved in prostitution.

During this contact, MF initially lied to the officer about her identity and age. She then told the officer her true name and age and stated she was instructed by her "pimp" to lie to the police about her age and name if she was contacted.

The officer requested Human Trafficking Task Force assistance with the investigation. When I arrived on scene, MF said that there was another female minor prostitute in room #129 at the Super 8 motel at 425 Roosevelt Avenue in National City. She also said that her pimp, ROBERT JOHNSON, and his wife, ASHLEY JOHNSON, were also at the location. She told me the Johnsons carried one real gun and one pellet gun for protection.

1 MF said she paid ROBERT JOHNSON and ASHLEY JOHNSON the  
2 proceeds from her sex acts. She worked for them in Los Angeles and in San Diego.  
3 They arrived in National City at midnight on 04-11-2015.

4 Officers then went to the motel room MF identified. It was registered to  
5 ROBERT JOHNSON. Officers contacted ROBERT JOHNSON, ASHLEY  
6 JOHNSON and an adult female, subsequently identified as Sedala Patterson as  
7 they exited the motel room. Patterson is the female MF believed was a minor.

8 ROBERT and ASHLEY JOHNSON were attempting to enter a vehicle  
9 when they were approached by officers. ROBERT JOHNSON gave Detective S.  
10 Adams consent to search the vehicle and the motel room he had just exited.

11 Detective Adams located an unloaded .38 caliber revolver in the trunk of the  
12 car and a replica firearm in the glove box. A purse in the trunk of the vehicle  
13 contained three cell phones. Another black case contained another cell phone and  
14 approximately \$460 in cash. The hotel room contained numerous condoms.

15 MF said told me that Patterson introduced her to ROBERT and ASHLEY  
16 JOHNSON and that Patterson told her that ROBERT JOHNSON was Patterson's  
17 pimp. MF met the Johnsons in February 2015 in Los Angeles. While in the Los  
18 Angeles area, she participated in sex acts for money and gave ROBERT and  
19 ASHLEY JOHNSON the proceeds. ASHLEY JOHNSON created and maintained  
20 online advertisements featuring MF on Backpage. Both ASHLEY and ROBERT  
21 JOHNSON would collect money from her when she worked as a prostitute out of a  
22 hotel room or on the street. ROBERT JOHNSON told her to call him "Daddy" and  
23 explained how the rules of the "game" worked. He told her how much to charge  
24 "dates" for the different sex acts.  
25

26 ASHLEY JOHNSON told MF how to act during "dates" and told MF to go  
27 through her before addressing ROBERT JOHNSON. MF stated both ASHLEY and  
28  
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1 ROBERT JOHNSON knew how old she was and told her to lie to the Police when  
2 she was contacted. They gave her the fake name and date of birth to use. She said  
3 that ROBERT JOHNSON would provide her with condoms. MF said the firearm  
4 was in case they needed protection.

5 I conducted an online search for escort advertisements which MF described  
6 to me. I located an advertisement which MF said was set up for her. The phone  
7 number used in the advertisement was the phone number belonging to Paterson's  
8 cell phone.

9 MF gave me consent to search her cell phone. Included in the phone's  
10 frequent contacts were numbers for "Daddy," "Ashley," and "Smiley." MF told me  
11 "Daddy" was ROBERT JOHNSON, "Ashely" was ASHLEY JOHNSON and  
12 "Smiley" was Patterson.

13 One conversation with "Daddy" began on 04-10-2015 after midnight. Based  
14 on my training and experience I know the term "Daddy" is commonly used by a  
15 prostitute to refer to her pimp. The conversation discussed a previous police  
16 contact and how MF can't be on "Sepulveda" anymore. Based on my training and  
17 experience, I know Sepulveda Ave is an area known for street prostitution. In a  
18 second conversation from 04-11-2015, "Daddy" asks MF if she is on a double date  
19 and asks her when she is going to be done. MF tells him she is waiting in the hotel  
20 room needs another condom.

21 In a conversation with "Ashley" on 04-11-2015, "Ashley" asks MF if she is  
22 done and if they are on a "date". MF tells "Ashley" she is. "Ashley" attempted to  
23 contact MF after she had been detained by National City Police.

24 I conducted an online search using the Johnson's phone numbers. I located a  
25 Backpage escort advertisement with ROBERT JOHNSON's phone number as the  
26 contact number for the advertisement. This advertisement is the nearly the same as  
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1 the advertisement MF said was set up for her by ASHLEY JOHNSON, which used  
2 Patterson's phone number.

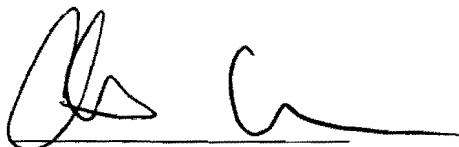
3 Detective Adams conducted an interview with ASHLEY JOHNSON. She  
4 was advised of her Miranda rights, which she waived. She denied being involved  
5 in prostitution.

6 Detective Adams and I conducted an interview with ROBERT JOHNSON.  
7 He was advised of his Miranda rights, which he waived. He said he met MF about  
8 a month ago. He admitted protecting both MF and Patterson.

9 I conducted an interview with Patterson. She was advised of her Miranda  
10 rights, which she waived. She said she introduced MF to ROBERT and ASHLEY  
11 JOHNSON to keep her safe. She claimed she met her on the "track" in Los  
12 Angeles area and MF was being harassed by other pimps. She told ROBERT  
13 JOHNSON not to make the girls call him "Daddy" but said he had a big ego. She  
14 stated ROBERT JOHNSON would hold everyone's money from their prostitution  
15 but would give money out when it was needed.  
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17 Patterson said MF had about three "dates" since they had been in National  
18 City.

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Chris Haughey  
Special Deputy U.S. Marshal